



YELENA SHAROVA, ESQ. \*+  
STEVEN GARFINKLE ESQ. \*+  
CHARLES KASER ESQ. \*  
NANI KIM ESQ. \*  
CHARLES MARINO ESQ. \*  
BRUCE PROVDA ESQ. \*  
\*NY +NJ

Telephone 1.718.766.5153  
Facsimile 1.718.504.3599  
Email ckaser@sharovalaw.com

PARALEGALS:  
FRANKLIN DAVIS JR  
ALVIN KORSUNSKIY  
CELINA QUEVEDO  
MABEL SANTANA  
HANNA SKARULIS

October 22<sup>nd</sup>, 2021

**VIA ELECTRONIC FILING**

Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: United States v. Apocalypse Bella  
21 CR 247**

Dear Judge Engelmayer:

On October 5<sup>th</sup>, 2021, this Court granted my request for an extension of time to file a suppression motion., and Defendant Bella's time was extended to October 28, 2021. I am cognizant that the Court stated that no more extensions would be given for this motion.

However, my wife has gone into labor ahead of schedule as we are expecting our second child. I will be out of the office starting today for fourteen (14) days. Therefore, given the circumstances, I am requesting a two-week extension to file motion papers from October 28, 2021 to November 12, 2021.

The Government, through Assistant US Attorney Dina Mcleod, has no objection and consents to this request.

Additionally, we would request that all dates in relation to motions be extended, including all response and reply papers.

Thank you for your time and consideration of my request.

Respectfully Submitted,

/s/ Charles Kaser  
Charles Kaser, Esq.  
Attorney for Apocalypse Bella

**gGRANTED.** The Court wishes counsel and his family well.  
The Clerk of Court is requested to terminate the motion at  
Dkt. No. 68.

10/22/2021

SO ORDERED.

A handwritten signature in blue ink that reads 'Paul A. Engelmayer'.

PAUL A. ENGELMAYER  
United States District Judge